

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NICOLE BERNSTEIN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

RAMP BUSINESS CORPORATION,

Defendant.

Case No. 1:24-cv-09595-JGK-RFT

CLASS ACTION

FIRST JOINT UPDATE ON THE STATUS OF DISCOVERY

Pursuant to the Court’s June 24, 2025, Order [ECF No. 36 (“Order”)], the parties respectfully submit the following Joint Update on the Status of Discovery. On June 25, 2025, Plaintiff served upon Defendant a Notice of Rule 30(b)(6) Deposition (“Deposition Notice”), noticing the July 10, as the date for the deposition of Defendant’s corporate representative(s). Plaintiff offered to work with Defendant on an alternate date if July 10 was not workable, while being mindful of the impending case deadlines.

The parties have scheduled a call for July 7 at 1:30 p.m. ET to meet and confer over the topics in the Deposition Notice. Defendant intends to produce call logs this week, and will follow that up with complaint information, likely after the holiday weekend.

Dated: July 1, 2025

Respectfully submitted,

/s/ Ryan D. Watstein

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 1, 2025, a true and correct copy of the foregoing document, and all accompanying documents, was filed through the Court's Electronic Case Filing (ECF) system, which automatically served a copy on all counsel of record via their registered email addresses.

/s/ Christopher Gold
Christopher Gold, Esq.